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Original filing date: August 4, 2022
Redacted filing date: August 11, 2022

The Honorable Stephanos Bibas
United States District Court
for the District of Delaware
844 North King Street
Wilmington, DE 19801-3570

REDACTED - PUBLIC VERSION

Re: *Thomson Reuters Enterprise Centre GmbH v. ROSS Intelligence Inc.*,
C.A. No. 20-613 (SB)

Dear Judge Bibas:

We write on behalf of Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (“Plaintiffs”) in response to Defendant ROSS Intelligence Inc.’s (“ROSS”) letter of August 3, 2022 (D.I. 208) concerning Plaintiffs’ motion to amend.

ROSS’s misguided letter troublingly ignores two important truths. **First**, while ROSS is correct that Plaintiffs refused to withdraw their statement regarding Mr. von Simson’s [REDACTED], ROSS notably neglected to mention that Plaintiffs provided ROSS with a fulsome explanation of how ROSS simply misunderstands how Westlaw operates. ROSS emailed Plaintiffs at 9:22 p.m. on Tuesday concerning its letter, and Plaintiffs responded Wednesday afternoon. *See* Ex. A. Instead of seeking clarity if ROSS thought Plaintiffs’ explanation was not sufficient, ROSS rushed to file its letter without even referencing the Plaintiffs’ response.

Second, ROSS is just wrong. On the Westlaw Canada website, there is an option to select “All Westlaw U.S.” under the “International” tab. Clicking this link redirects the user away from Westlaw Canada to a new login page for the United States Westlaw product. Once the user clicks through the login page, the user is brought to the homepage for the United States Westlaw product.

[REDACTED]

Thus, contrary to ROSS’s letter, Plaintiffs’ statement that [REDACTED] is both correct and supported by the cited evidence.¹

¹ ROSS’s argument also makes no sense when looked at in the context of [REDACTED]. ROSS was not interested in accessing [REDACTED]. *See* Ex. B, ROSS-010203158

[REDACTED]

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In sum, ROSS is simply mistaken about [REDACTED]
[REDACTED].

Respectfully,

/s/ Michael J. Flynn

Michael J. Flynn (#5333)

MJF/bac
Attachments

cc: All Counsel of Record (via electronic mail; w/attachments)

[REDACTED]